Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
Provision of Improved	)	CC Docket No. 98-67
Telecommunications Relay Service	)	
	)	

Reply Comments of:

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Thank you for this opportunity to offer reply comments on Internet relay services. I am a hard of hearing individual who uses Relay to a great advantage but I also use Internet and email for some of my communication needs.

Reimbursement for IP-Relay

USTA commented that the FCC must determine if IP-Relay is eligible for reimbursement. I urge the FCC to treat WorldCom's proposal as a Relay service that is reached by way of the Internet. In the future, it is conceivable that traditional state Relay centers will all have an Internet connection method in addition to a public switched network connection method.

Protocol Conversion

Several comments support reimbursement for protocol conversion. AT&T reported that it has been providing protocol conversion for a number of years and there is a high demand for this service. TDI was not in favor of reimbursement but said it would welcome the service. Since IP-Relay makes protocol conversion much more attractive for the Internet user and more cost effective for Relay providers, the time has come for a decision on a reimbursement rate. The rate should be attractive enough to promote and encourage this type of service, but reimbursement at the same rate as Communication Assistant involvement does not seem to be justified from the perspective of this potential user. I would be pleased for the FCC to gather cost estimates from interested providers and determine a fair rate.

Most importantly, these protocol conversion "bridges" should be available, and IP is the best way to provide them, for these reasons:

1. People who communicate often with a computer to a person who uses a TTY could purchase a bridge (a special modem that converts ASCII to Baudot) for their computer, but it would be far better for them to be able to use a bridge that is accessible from a web page from any computer,

such as when they are traveling.

2. While a special modem may be available for purchase for a desktop or laptop computer, there is little likelihood that equivalent modems will be available for handheld devices or devices of the future.

3. Millions of people already have computers with Internet access. It is very unlikely that these same millions of people will ever purchase a TTY and there is some resistance towards their using Relay services. The Internet bridge would immediately open communications between TTY users and a vast number of businesses, agencies, theaters, and individuals.

4. Conversely, a large number of TTY users will never purchase a computer, unless computers of the future are as simple as a TTY. These dedicated TTY users need a simple, reliable way to communicate with other people. Presently they use traditional Relay services to communicate with hearing people, and to some extent, use Relay services to communicate with computer users. A bridge would reduce the amount of Relay services they need. Most of us use email, instant messaging, and 2way pagers for our communication needs. It is the dedicated TTY user that is left behind, and an Internet bridge would help to bring them back up to speed.

5. Without a special modem that performs protocol conversion, it is possible to establish direct communications over the public switched network between a computer to another computer, and between a computer to a TTY that has the ASCII feature. Due to set-up problems in the computers or in the ASCII TTY, this mode of communication is difficult. Long distance charges may apply and the call may not have even been successful. It is much simpler for most users to connect to an ISP, and a bridge would insure good communications. The computer user would not need to know if the remote TTY has the ASCII feature, or be concerned with any set-up for it. This may be the most compelling reason for Internet based protocol conversion, and I do not know anyone personally who uses this method successfully.

Minimum Standards

In addition to the minimum standards already established, IP-Relay should have certain standards applied, such as a clear web page, help information accessible from the web page, directions for performing certain tasks, a feedback mechanism, and status indicators for call connection. Additionally, there should be information about emergency calls: whether an emergency call would flow to the proper place with updated information when changes or improvements occur.

For conditions where it is technically impossible for IP-Relay to meet traditional Relay minimum standards, I support relaxing the standards as long as there will be reviews available for public inspection. The IP-Relay home page could have a link to another page that outlines which standards are in effect and a score card on how well the provider has met them. I agree with some comments that there should be an element of market driven performance that will foster competition. However, this is not to say that a standard as elementary as call connect time should be relaxed. I recognize that Internet sometimes gets overloaded and call connect time may not be under the IP-Relay provider's control. In this instance, call connect time may need to be defined

differently for an Internet connection versus a dial up connection.

I thank the FCC for the opportunity to offer these comments.

Ronald H. Vickery